

Appl. No. 10/805,970
Amdt. Dated July 19, 2005
Reply to Office Action of February 3, 2005

REMARKS

This Amendment is in response to the PTO action mailed June 6, 2005. Applicant has amended claims 1 and 17. In view of the amendments and remarks, Applicant believes that the application is in condition for allowance.

In the PTO action, claims 1-2, 5, 6, 15, 17 were rejected under 35 U.S.C. § 102(b) or in the alternative under 35 U.S.C. § 103(a) over Eschweiler, Jr. et al., patent no. 5,242,369 ("Eschweiler").

The PTO action identified item 54 in Eschweiler as the first and second fold plate. Eschweiler, however, describes item 54 as a "side frame." The PTO action identified Eschweiler removable plate as item 12 and 14. Eschweiler, however, describes items 12 and 14 as "chutes." Namely buckle chute 12 and inverting chute 14. As depicted and described in Eschweiler, the side frame 54 forms an overall housing on the external side of the apparatus and the chutes 12 and 14 are mounted therein. As shown in Fig. 2, the chutes 12 and 14 are oriented perpendicular to the side frame 54. The chutes 12 and 14 receive the sheets of paper and process the paper by buckling for the buckle chute 12 and inverting in the inverting chute 14. It is clear from the disclosure of Eschweiler that the side frame 54 does not process paper sheets nor interact with the chutes 12 and 14 in order to help to process the paper sheets.

The only potential work area depicted in Eschweiler is the area provided between each pair of buckle chutes 12 and each individual pair of inverting chutes 14. Eschweiler does not describe or disclose a work area provided between the side frame 54 and either of the chutes 12 and 14. Therefore, even if the chutes 12 and 14 were removable with respect to the side frame 54, they do not form a first work area between each side frame and each chute 12 and 14. As

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discussed above, the chutes 12 and 14 are oriented perpendicular to the side frame 54 and there is no work area formed therebetween.

Amended claim 1 requires a processing area including a first removable plate attached to the first fold plate forming a first work area therebetween and a second removable plate attached to the second fold plate forming a second work area therebetween. As well, claim 1 requires a feeding mechanism for feeding paper sheets from the paper input area to the processing area and at least one of the first and second work areas providing processed sheets. Eschweiler fails to teach or suggest each of these elements. Eschweiler does not teach or suggest a first work area formed between a first removable plate and a first fold plate. As well, Eschweiler does not teach or suggest a second work area formed between a second removable plate and a second fold plate. Further, Eschweiler fails to teach or suggest the processing of sheets by at least one of the first and second work areas.

Claim 17 also requires an upper plate removably mounted to the lower fold plate and forming the work area therebetween. Claim 17 also requires a work area formed between the removable plate and a lower fold plate. As discussed above for claim 1, Eschweiler fails to teach or suggest a removable plate and a fold plate with a work area formed therebetween. Therefore, Eschweiler fails to teach or suggest each of the elements of independent claims 1 and 17. Claims 2-16 and 18-22 depend from claims 1 and 17, and include the limitations thereof respectively and are also allowable over Eschweiler.

Claims 24-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Eschweiler. Claims 24 and 25 depend from claim 17 and include all the limitations thereof. As discussed, above Eschweiler fails to teach or suggest all of the limitations of claim 1 and therefore dependent claims 24 and 25 are also allowable over Eschweiler.

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Claims 7-14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Eschweiler in view of Bluthardt et al. Claims 7-14 depend from claim 1 and include all of the limitations thereof. As discussed above, Eschweiler fails to teach or suggest all of the limitations of claim 1. Likewise Bluthardt also fails to teach or suggest each of the limitations of claim 1. For example, Bluthardt fails to disclose a processing area including a first removable plate attached to the first fold plate forming a first work area therebetween and a second removable plate attached to the second fold plate forming a second work area therebetween. Therefore, neither Eschweiler nor Bluthardt, alone or in combination, teach or suggest each of the elements of claim 1. Therefore because each of claims 7-14 include the limitations of claim 1 they are allowable over Eschweiler in view of Bluthardt.

Therefore, in view of the above amendments and remarks, claims 1-25 are in condition for allowance. Applicant respectfully requests that the case be moved to issuance.

Respectfully submitted,

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